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6 Attorneys for Defendant Strategic Behavioral Health LLC
Montevista Hospital, Inc.

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 RENAE SIMMS,

11 Plaintiff,

12 vs.

13 STRATEGIC BEHAVIORAL HEALTH, LLC,
a Delaware corporation, BHC MONTEVISTA
14 HOSPITAL, INC., incorrectly named as
MONTEVISTA HOSPITAL, a Delaware
15 corporation, DOES I through X, inclusive, and,
ROE CORPORATIONS I through X, inclusive,

16 Defendants.
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Case No.: 2:19-cv-01998-JCM-VCF

**STIPULATION EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

18 IT IS HEREBY STIPULATED by and between Plaintiff RENAE SIMMS ("Plaintiff"),
19 through her counsel, HOLMAN LAW OFFICE, and Defendant, STRATEGIC BEHAVIORAL
20 HEALTH LLC ("SBH"), by and through its counsel, Jackson Lewis P.C., that Defendant shall
21 have an extension up to and including June 8, 2020, in which to file its response to Plaintiff's
22 First Amended Complaint. This Stipulation is submitted and based upon the following:

23 1. Plaintiff filed her First Amended Complaint on January 1, 2020. ECF No. 7.
24 Defendants accepted served for the First Amended Complaint on April 1, 2020. ECF No. 7 and
25 ECF No. 8.

26 2. Defendant's response to the Complaint is currently due on June 1, 2020.

27 3. Due to the press of other matters, including adjustments made necessary by the
28 COVID-19 pandemic, and in order to fully respond to the pleading, Defendants require additional

1 time to respond to the Complaint. Defendants accordingly request an extension, up to and
2 including June 8, 2020, to file its responsive pleading.

3 4. This is the first request for an extension of time for Defendants to file a response to
4 Plaintiff's First Amended Complaint.

5 5. This request is made in good faith and not for the purpose of delay.

6 6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as
7 waiving any claim and/or defense held by any party.

8 Dated this 1st day of June, 2020.

9 HOLMAN LAW OFFICE

JACKSON LEWIS P.C.

10
11 /s/ Kristina S. Holman
12 Kristina S. Holman
13 3470 E. Russell Road, Suite 202
14 Las Vegas, NV 89120


/s/ Lisa A. McClane
Lisa A. McClane, Bar No. 10139
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101

15 Attorneys for Plaintiff

Attorneys for Defendant

16 **ORDER**

17 IT IS SO ORDERED

18 
19 _____
20 United States Magistrate Judge

21 Dated: 6-2-2020
22 _____

23 4848-6054-6238, v. 1
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